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Attorneys for Defendants
Nth Connect Telecom, Inc. and Steven Chen

UNITED STATES DISTRICT COURT
CALIFORNIA NORTHERN DISTRICT (SAN JOSE)

VLADIMIR A. BALAREZO, individually and
on behalf of others similarly situated

Plaintiff,

vs.

NTH CONNECT TELECOM INC., and
STEVEN CHEN,

Defendants.

Case No. C 07 05243 JF (PVT)

STIPULATION TO CONTINUE THE
HEARING ON PLAINTIFFS' MOTION FOR
APPROVAL OF *HOFFMANN-LA ROCHE*
NOTICE TO APRIL 18, 2008 AND TO
CONTINUE MARCH 21, 2008 CASE
MANAGEMENT CONFERENCE;
[PROPOSED] ORDER THEREON

STIPULATION

The parties, through their respective counsel of record, stipulate as follows:

1. Plaintiffs' motion for approval of *Hoffmann-La Roche* notice ("Motion") is currently scheduled for hearing on April 11, 2008.

2. Defendants' counsel, Grant Carlson, will be on a pre-planned family vacation during that week.

3. Given the conflict, parties hereby stipulate and respectfully request that the hearing on the Motion be continued to April 18, 2008.

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1 4. The parties also stipulate and request that the hearing date on the March 21, 2008
2 Further Case Management Conference be continued to April 18, 2008.

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4 Dated: March 17, 2008

By: /s/ ADAM WANG
Adam Wang
Law Offices of Adam Wang
Attorney for Plaintiffs

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7 /s/ TOMAS MARGAIN
Tomas Margain
Law Offices of Tomas Margain
Attorney for Plaintiffs

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10 Dated: March 17, 2008

By: /s/ GRANT CARLSON
Grant Carlson
Attorney for Defendants

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14 **[PROPOSED] ORDER**

15 Pursuant to parties' stipulation, and good cause having been found, IT IS HEREBY
16 ORDERED:

17 1. That the plaintiff's that the hearing on plaintiff's MOTION FOR APPROVAL OF
18 *HOFFMANN-LA ROCHE* NOTICE is continued from April 11, 2008 to April 18, 2008 at 9:00 a.m.
19 in Courtroom 3.

20 2. That the Further Case Management Conference set for March 21, 2008 is likewise
21 continued to April 18, 2008 at 9:00 a.m. in Courtroom 3.

22 IT IS SO ORDERED.

23 Dated: March ____, 2008

By: _____
Jeremy Fogel
United States District Judge